

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division

THE LEADER’S INSTITUTE, LLC,

Plaintiff,

v.

TOGETHER WE RISE CORPORATION,
and DANIEL MENDOZA,

Defendants.

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CIVIL ACTION NO. 3:17-cv-2604-B

**DARLENE GHAVIMI’S AND CHARLES ROGERS’
MOTION TO WITHDRAW AS COUNSEL**

Darlene F. Ghavimi and Charles J. Rogers of the law firm of Conley Rose, P.C. (“Movants”), counsel for Plaintiff The Leader’s Institute, LLC respectfully move this Court for permission to withdraw as counsel of record for Plaintiff. The reasons for withdrawal are as follows:

1. Movants were given notice of termination and effectively discharged by The Leader’s Institute, LLC by electronic mail on January 29, 2018.
2. Plaintiff will continue to be represented by Kristin Jordan Harkins, address listed below:

Kristin Jordan Harkins
Wick Phillips, LLP
3131 McKinney Ave, Suite 100
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Telephone: 214-692-6200

3. In addition, Amy E. LaValle and Jerry C. Harris of Wick Phillips, LLP entered an appearance yesterday on behalf of Plaintiff. *See* Dkt. Nos. 27 and 28.

4. This motion is being brought for good cause and is not sought for the purpose of delay. This motion will not result in a delay of the case.

WHEREFORE Movants respectfully request that the Court enter an Order permitting Movants to withdraw in the above-styled cause.

DATED this 9th day of January, 2018.

Respectfully submitted,

/s/ Darlene F. Ghavimi

Darlene F. Ghavimi

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Defendants, Peter Willsey on February 9, 2018 and counsel has indicated that they do not oppose this motion.

/s/ Darlene F. Ghavimi

Darlene F. Ghavimi

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 9th day of February with a copy of this document via this Court's CM/ECF system per Local Rule 5.1. Any other counsel of record or party will be served by electronic mail, and/or first class mail on this same date.

/s/ Darlene F. Ghavimi

Darlene F. Ghavimi